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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

A.B.

Plaintiff

vs

**DR. JASON CAMPBELL
and OREGON HEALTH &
SCIENCE UNIVERSITY**

Defendants

Case No. 3:21-cv-00311-HZ

**PLAINTIFF'S MOTION FOR
ENTRY OF THE COURT'S FORM
TIER 1 PROTECTIVE ORDER**

Oral Argument Requested

CERTIFICATION

The parties made a good faith effort by email to resolve the dispute and have been unable to do so.

MOTION

Under FRCP 26(c) and this Court's inherent authority, plaintiff respectfully moves for entry of the Court's form tier 1 protective order.

A draft proposed order with slight modifications is attached, including inserted allegations from the complaint detailing why the facts at issue in this action create a need for a protective order, and a detailed statement describing the confidential nature of the documents and information at issue. Fuller Declaration ¶ 1. OHSU has publicly stated that it intends to soon file an answer to the complaint. *Id.* at ¶ 2. Plaintiff files this motion now so a protective order is in place by the time the parties exchange initial disclosures, which will contain the names of other alleged victims of sexual harassment at OHSU that warrant protection from public access at this early stage of the litigation. *Id.* at ¶ 3.

March 4, 2021

RESPECTFULLY FILED,

s/ Michael Fuller

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CERTIFICATE OF SERVICE

I caused this document to be served on all parties who have filed an appearance in this action through the CM/ECF system.

March 4, 2021

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